

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

[1] MIGUEL A. CANALES-VILLALONGO,
a.k.a. "Buby", "El Boss",

(Counts ONE through FIVE)

[2] JOSE A. RIVERA-AYALA, a.k.a. "Joito",
(Counts ONE through FIVE)

[3] LUIS M. DE JESUS-LOPEZ, a.k.a.
"Willo",

(Counts ONE through FIVE)

[4] RAYMOND E. HIRALDO-FIGUEROA,
(Counts ONE through FIVE)

[5] JUAN C. ORTEGA-RIVERA, a.k.a.
"Kili",

(Counts ONE through FIVE)

[6] JORGE QUIÑONEZ-OSORIO a.k.a.
"Jorgito",

(Counts ONE through FIVE)

[7] JOSE D. ALAMA-VIZCARRONDO, a.k.a.
"Pulmon",

(Counts ONE through FIVE)

[8] FELIPE RAMOS-SANTOS, a.k.a. "Curu",
(Counts ONE through FIVE)

[9] ELVIN O. ORTIZ-CORREA, a.k.a.
"Bemba"

(Counts ONE through FIVE)

[10] WILLIAM CRESPO-RIVERA, a.k.a.
"Willito",

(Counts ONE through FIVE)

[11] RAMON E. FIGUEROA-GARCE, a.k.a.
"Bebo Marcia"

(Counts ONE through FIVE)

[12] ALEJANDRO FELICIANO-ANDINO,
a.k.a. "Muslo",

(Counts ONE through FIVE)

[13] LUIS E. FUENTES-WALKER,
(Counts ONE through FOUR)

INDICTMENT

FILED UNDER SEAL

CRIMINAL NO. 13- 130 (JAG)

Violations:

(COUNT ONE)

Title 21, United States Code, Sections
841(a)(1), 846, and 860

(COUNT TWO)

Title 21, United States Code, §§841(a)(1) and
860 and Title 18, United States Code, § 2

(COUNT THREE)

Title 21, United States Code, §§ 841(a)(1)
and 860 and Title 18, United States Code, § 2

(COUNT FOUR)

Title 21, United States Code, §§ 841(a)(1)
and 860 and Title 18, United States Code, § 2

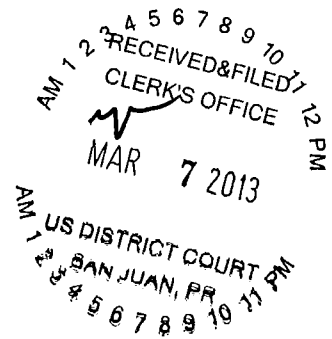
(COUNT FIVE)

Title 18, United States Code, § 924(c)

Narcotics Forfeiture Allegation

Title 21, United States Code, § 853 and Rule
32.2(a) F.R.C.P.

(FIVE COUNTS)



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[14] **VICTOR J. CALDERON-ZAYAS, a.k.a. "Jordan",**
(Counts ONE through FOUR)
[15] **EDWIN BARBOSA-VIZCARRONDO,**
(Counts ONE through FOUR)
[16] **EVELYN CANALES-VILLALONGO,**
a.k.a. "Bebi",
(Counts ONE through FOUR)
[17] **ANGEL CANALES-VILLALONGO,**
a.k.a. "Blade",
(Counts ONE through FOUR)
[18] **JOSE M. DELGADO-PEREZ, a.k.a. "El Gallero",**
(Counts ONE through FOUR)
[19] **FRANCISCO O. FELICIANO-ANDINO,**
a.k.a. "Frank"
(Counts ONE through FOUR)
[20] **JOSE E. FIGUEROA-GARCE, a.k.a. "Lobo",**
(Counts ONE through FOUR)
[21] **KELVIN M. LOPEZ-VEGA, a.k.a. "Jonkiel",**
(Counts ONE through FOUR)
[22] **JACKELINE RENTAS-DE-JESUS,**
(Counts ONE through FOUR)
[23] **ALEXIS PARRILLA-ECHEVARRIA,**
a.k.a. "Carton",
(Counts ONE through FOUR)
[24] **JOSE R. RODRIGUEZ-RIVERA, a.k.a. "Vaca"**
(Counts ONE through FOUR)
[25] **YANIBAL ORTIZ-ARROYO,**
(Counts ONE through FOUR)
[26] **LUIS M. ANDINO-BERNIER, a.k.a. "Maño",**
(Counts ONE through FOUR)
[27] **ROY J. RODRIGUEZ-ROMAN, a.k.a. "Cara de Vieja",**
(Counts ONE through FOUR)
[28] **LIZA ANDINO,**
(Counts ONE through FOUR)
[29] **RAUL ALVAREZ-HERNANDEZ, a.k.a. "Paul", "Ñe",**
(Counts ONE through FOUR)
[30] **NATHANAEL RAMOS-SANTOS,**
(Counts ONE through FOUR)

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[31] DIANA COLON,
(Counts ONE through FOUR)

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Canovanas, District of Puerto Rico and within the jurisdiction of this Court,

[1] MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss",
[2] JOSE A. RIVERA-AYALA, a.k.a. "Joito",
[3] LUIS M. DE JESUS-LOPEZ, a.k.a. "Willo",
[4] RAYMOND E. HIRALDO-FIGUEROA,
[5] JUAN C. ORTEGA-RIVERA, a.k.a. "Kili",
[6] JORGE QUIÑONEZ-OSORIO a.k.a. "Jorgito",
[7] JOSE D. ALAMA-VIZCARRONDO, a.k.a. "Pulmon",
[8] FELIPE RAMOS-SANTOS, a.k.a. "Curu",
[9] ELVIN O. ORTIZ-CORREA, a.k.a. "Bemba",
[10] WILLIAM CRESPO-RIVERA, a.k.a. "Willito",
[11] RAMON E. FIGUEROA-GARCE, "Bebo Marcia",
[12] ALEJANDRO FELICIANO-ANDINO, a.k.a. "Muslo",
[13] LUIS E. FUENTES-WALKER,
[14] VICTOR J. CALDERON-ZAYAS, a.k.a. "Jordan",
[15] EDWIN BARBOSA-VIZCARRONDO,
[16] EVELYN CANALES-VILLALONGO, a.k.a. "Bebi",
[17] ANGEL CANALES-VILLALONGO, a.k.a. "Blade",
[18] JOSE M. DELGADO-PEREZ, a.k.a. "El Gallero",
[19] FRANCISCO O. FELICIANO-ANDINO, a.k.a. "Frank",
[20] JOSE E. FIGUEROA-GARCE, a.k.a. "Lobo",
[21] KELVIN M. LOPEZ-VEGA, a.k.a. "Jonkiel",
[22] JACKELINE RENTAS-DE-JESUS,
[23] ALEXIS PARRILLA-ECHEVARRIA, "Carton",
[24] JOSE R. RODRIGUEZ-RIVERA, "Vaca",
[25] YANIBAL ORTIZ-ARROYO,
[26] LUIS M. ANDINO-BERNIER, a.k.a. "Maño",
[27] ROY J. RODRIGUEZ-ROMAN, a.k.a. "Cara De Vieja",
[28] LIZA ANDINO,
[29] RAUL ALVAREZ-HERNANDEZ, a.k.a. "Paul", "Ñe",
[30] NATHANAEL RAMOS-SANTOS,
[31] DIANA COLON,

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the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and/or to distribute controlled substances, to wit: in excess of two hundred and eighty (280) grams of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; in excess of five (5) kilograms of cocaine, a Schedule II, Narcotic Drug Controlled Substance; in excess of one hundred (100) kilograms of marijuana, a Schedule I, Controlled Substance; within one thousand (1,000) feet of the real property comprising a public or private school and/or playground. All in violation of Title 21, United States Code Sections 841(a)(1), 846 and 860.

I. OBJECT OF THE CONSPIRACY

The object of the conspiracy was to distribute controlled substances at San Isidro Ward, including but not limited to the drug points located at Monte Verde, Villa Hugo and Las Casitas sectors, and in other areas within the Municipality of Canovanas, Puerto Rico, all for significant financial gain and profit.

II. MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would accomplish and further the object of the conspiracy, among others, included the following:

1. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would purchase wholesale quantities of cocaine and marijuana in order to distribute the same in street quantity amounts at their drug distribution points located in San Isidro Ward and other areas within the Municipality of Canovanas, Puerto Rico.

2. It was further part of the manner and means of the conspiracy that the leader would maintain a group of co-defendants administrating the daily activities of the drug

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distribution point. The defendants and their co-conspirators would act in different roles in order to further the goals of the conspiracy, to wit: leaders and drug point owners who directed and supervised runners, enforcers, sellers, drug processors, lookouts, and facilitators.

3. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would weigh, "cut", divide, and package the cocaine, crack and marijuana in distinctive "baggies" and/or "vials" in order to keep track of their narcotics.

4. It was a further part of the manner and means of the conspiracy that some of the cocaine purchased at wholesale quantities would be converted into crack cocaine and "cooked" for subsequent sale and distribution at their drug distribution points.

5. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would use residences located within the San Isidro Ward and other locations outside that area in order to store and conceal cocaine base ("crack"), cocaine, marijuana, drug paraphernalia, firearms and ammunition.

6. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would package and prepare the narcotics in houses located within the San Isidro Ward, using those places as "drug laboratories".

7. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators, in an effort to avoid detection from law enforcement agents, would use their residences as the drug distribution points and would conduct drug transactions from inside their residences located within San Isidro Ward, in Canovanas.

8. It was a further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would have access to residences located within San Isidro Ward in order to abscond during law enforcement interventions and/or initiatives aimed at

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disrupting their drug trafficking activities in the area.

9. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would take over residences and/or properties within the San Isidro Ward in order to use them as stash houses for drugs and firearms.

10. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would commit home invasions, robberies and other violent acts against residents of the San Isidro Ward in order to intimidate and make them abandon their homes. Afterwards, they would invade and take over those properties in order to use them for their drug trafficking activities.

11. It was further part of the manner and means of the conspiracy that the drug point would move through different locations within the San Isidro Ward in order to avoid detection by law enforcement.

12. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would use two-way radios ("walkie-talkies" referred to as scanners) in order to communicate and alert the presence of law enforcement agents or members of rival gangs.

13. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would act as "look-outs" at strategically located "observation points" within San Isidro Ward, in order to alert other co-conspirators of the presence of law enforcement agents and/or rival drug traffickers.

14. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would possess, carry, brandish, and use firearms to protect themselves and their drug trafficking organization. At different points during the conspiracy, the

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leaders would use and carry different types of firearms, including but not limited to "high power" rifles, in order to protect themselves, the narcotics and their profits from rival drug trafficking gangs.

15. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would use force, violence and intimidation in order to intimidate rival drug trafficking organizations, and in order to discipline members of their own drug trafficking organization.

16. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would conduct drive-by shootings against other rival drug traffickers and their drug points, as well as members of their own drug trafficking organization, in order to intimidate and maintain control of the drug trafficking activities.

17. It was further part of the manner and means of the conspiracy that the leader of the drug trafficking organization had final approval as to disciplinary actions to be imposed upon residents of San Isidro Ward and/or members of the conspiracy, as well as rivals of the drug trafficking organization.

18. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would provide payments to an individual in exchange for sensitive law enforcement information and/or police protection, as to dates and times of prospective interventions by the Police of Puerto Rico and/or law enforcement initiatives aimed at disrupting their drug trafficking activities.

III. ROLES OF THE MEMBERS OF THE CONSPIRACY

A. Leaders/Drug Point Owners

Leaders directly controlled and supervised the drug trafficking activities at the drug

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distribution points located within the San Isidro Ward, located within the Municipality of Canovanas, Puerto Rico. During the span of the conspiracy, leaders purchased multi-kilogram quantities of narcotics and oversaw the transportation and sale of such narcotics by their subordinates at the San Isidro Ward (including but not limited to Monte Verde, Villa Hugo and Las Casitas sectors), drug distribution points and other areas within the Municipality of Canovanas. At various times during the course of the conspiracy, leaders purchased firearms and allowed members of the conspiracy to carry such firearms and ammunition in order to protect the drug distribution activities.

The following co-conspirators acted as leaders:

[1] MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss", is the main leader of the drug trafficking organization.

In or about the year 2007, **[1] MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss",** became the main leader of the drug trafficking organization, wherefore he controlled, through co-defendants also acting as leaders, the drug distribution points located at San Isidro Ward, including but not limited to Monte Verde, Villa Hugo and Las Casitas sectors, as well as other areas in the Municipality of Canovanas, Puerto Rico. As the main leader, he directly supervised the operations at San Isidro Ward, received the proceeds from the distribution of narcotics sold during the span of his leadership in the conspiracy and was in charge of maintaining control of all the drug distribution activities. He had the final approving authority as to the discipline to be imposed upon the members of the conspiracy, as well as its enemies and rivals. At some point in the conspiracy, **[1] MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss",** was the "owner" of the colored cap vials of crack cocaine. At times during the conspiracy, he was also the owner, jointly with other co-conspirators, of the different brands

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of powder cocaine and the marijuana baggies being sold at the drug points. He would also act as an enforcer and a drug processor within the conspiracy. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation of the drug trafficking activities.

[2] **JOSE A. RIVERA-AYALA, a.k.a. "Joito"**, was also a leader in the drug trafficking organization. He was the "owner" of the ten dollar (\$10.00) clear baggies of powder cocaine jointly with defendant, [1] **MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss"**. He would also act as an enforcer and as a seller within the conspiracy. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation of the drug trafficking activities.

[3] **LUIS M. DE JESUS-LOPEZ, a.k.a. "Willo"**, was also a leader in the drug trafficking organization. At some point during the conspiracy, he was the "owner" of the twenty-five dollar (\$25.00), twelve dollar (\$12.00) and six dollar (\$6.00) baggies of marijuana. He would also act as an enforcer and as a drug processor within the conspiracy. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation of the drug trafficking activities.

[4] **RAYMOND E. HIRALDO-FIGUEROA**, was also a leader in the drug trafficking organization. He was in charge of the drug points during the absence of the main leader. He would be in charge of the administration of the drug points and its daily operations. He would also act as an enforcer and as a seller within the conspiracy. As an enforcer, he would use and

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carry firearms during and in relation to the drug trafficking activities would allow other members of the conspiracy to use and carry firearms during and in relation of the drug trafficking activities.

[5] **JUAN C. ORTEGA-RIVERA, a.k.a. "Kili"**, was also a leader in the drug trafficking organization. At some point in the conspiracy, he was the "owner" of the colored cap vials of crack cocaine jointly with defendant, [1] **MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby"**. He would also act as a runner, as a seller and as a facilitator within the conspiracy. He would also use and carry firearms during and in relation to the drug trafficking activities.

[6] **JORGE QUIÑONEZ-OSORIO a.k.a. "Jorgito"**, was also a leader in the drug trafficking organization. At some point in the conspiracy, he was the "owner" of the ten dollar (\$10.00) clear baggies of powder cocaine jointly with defendant, [1] **MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss"**. He would also act as an enforcer, as a runner, as a seller and as a facilitator within the conspiracy. As an enforcer, he would use and carry firearms during and in relation to the drug trafficking activities and would allow other members of the conspiracy to use and carry firearms during and in relation of the drug trafficking activities.

B. Enforcers

Enforcers did possess, carry, brandish, use and discharge firearms to protect the leaders and members of the drug trafficking organization, the narcotics, the proceeds derived from their sales, and to further accomplish the goals of the conspiracy. Enforcers often acted upon instructions given by the leaders of this organization. Enforcers would often provide protection to the drug trafficking organization's drug distribution points. The following individuals and others known and unknown to the Grand Jury, acted as enforcers for the drug trafficking

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organization:

In addition to the above-mentioned leaders and drug point owners who also acted as enforcers, the following individual and others known and unknown to the Grand Jury, acted as enforcers for the above described drug trafficking organization:

[7] JOSE D. ALAMA-VIZCARRONDO, a.k.a. "Pulmon", acted as an enforcer for the drug trafficking organization. Additionally, he would often act as a seller within the conspiracy;

C. Runners

The runners worked under the direct supervision of the leaders of the drug trafficking organization. They were responsible for providing sufficient narcotics to the sellers for further distribution at the drug point. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also supervise and make sure that there were street sellers for every shift of the drug point. They would make schedules and prepare ledgers to maintain accountability of the sales of the narcotics sold at the drug point. At various times, they would be responsible for recruiting street sellers and additional runners. The runners had a supervisory role within the conspiracy, as they would directly supervise on a daily basis, the activities of multiple sellers, and the daily activities of the drug point.

In addition to the enforcers who also acted as runners, the following individuals and others known and unknown to this Grand Jury, acted as runners for the drug trafficking organization:

[8] FELIPE RAMOS-SANTOS, a.k.a. "Curu", acted as a runner for the drug trafficking organization. Additionally, he would often act as a seller, as a drug processor and as a facilitator within the conspiracy and would also use and carry firearms during and in relation to the drug trafficking activities;

[9] ELVIN O. ORTIZ-CORREA, a.k.a. "Bemba", acted as a runner for the drug trafficking

organization. Additionally, he would often act as a seller within the conspiracy and would also use and carry firearms during and in relation to the drug trafficking activities;

[10] WILLIAM CRESPO-RIVERA, a.k.a. "Willito", acted as a runner for the drug trafficking organization. Additionally, he would often act as a seller within the conspiracy and would also use and carry firearms during and in relation to the drug trafficking activities;

D. Sellers

The sellers would distribute street quantity amounts of heroin, crack cocaine, cocaine, and marijuana. As sellers, they were accountable for the drug proceeds and the narcotics sold at the drug distribution points. At times, sellers would use two-way radios ("walkie-talkies", "scanners") in order to communicate with other members of the conspiracy.

In addition to the above-mentioned enforcers and runners who also acted as sellers, the following individuals and others known and unknown to the Grand Jury, acted as sellers for the above described drug trafficking organization:

[11] RAMON E. FIGUEROA-GARCE, a.k.a. "Bebo Marcia", who would also use and carry firearms during and in relation to the drug trafficking activities;

[12] ALEJANDRO FELICIANO-ANDINO, a.k.a. "Muslo", who would also use and carry firearms during and in relation to the drug trafficking activities;

[13] LUIS E. FUENTES-WALKER,

[14] VICTOR J. CALDERON-ZAYAS, a.k.a. "Jordan",

[15] EDWIN BARBOSA-VIZCARRONDO,

[16] EVELYN CANALES-VILLANLONGO, a.k.a. "Bebi",

[17] ANGEL CANALES-VILLALONGO, a.k.a. "Blade",

[18] JOSE M. DELGADO-PEREZ, a.k.a. "El Gallero",

[19] FRANCISCO O. FELICIANO-ANDINO, a.k.a. "Frank",

[20] JOSE E. FIGUEROA-GARCE, a.k.a. "Lobo",

[21] KELVIN M. LOPEZ-VEGA, a.k.a. "Jonkiel", who also acted as a facilitator within the conspiracy;

[22] JACKELINE RENTAS-DE-JESUS,

[23] ALEXIS PARRILLA-ECHEVARRIA, a.k.a. "Carton",

[24] JOSE R. RODRIGUEZ-RIVERA, a.k.a. "Vaca",

[25] YANIBAL ORTIZ-ARROYO, who also acted as a look out within the conspiracy;

[26] LUIS M. ANDINO-BERNIER, a.k.a. "Maño", who also acted as a facilitator within the conspiracy;

[27] ROY J. RODRIGUEZ-ROMAN, a.k.a. "Cara de Vieja", who also acted as a facilitator within the conspiracy;

[28] LIZA ANDINO,

[29] RAUL ALVAREZ-HERNANDEZ, a.k.a. "Paul", "Ñe",

[30] NATHANAEL RAMOS-SANTOS,

[31] DIANA COLON;

E. Drug Processors

Drug processors would meet under the direction of the leaders of the drug trafficking organization at apartments within the above mentioned public housing projects or at other outside locations within or near the municipality of Carolina in order to weigh, cut, mix, and prepare the controlled substances for street distribution. They would also package the heroin, crack, cocaine and marihuana in single dosage amounts and in distinctive "baggies", "decks" and/or "vials".

F. Look-Outs/Facilitators

“Look-outs” would conduct surveillance at strategic locations within the above mentioned public housing projects in order to detect the presence of law enforcement personnel and members of rival gangs; they would communicate their observations to members and other look-outs and/or sellers with two-way radios (“walkie-talkies”, scanners) and would receive payment from the sellers for their services as look-outs.

“Facilitators” would allow the use of their apartments in the public housing project in order to process, store, and package narcotics for distribution. Some facilitators allowed members of the drug trafficking organization to run and hide in their apartments to avoid police detection. Facilitators would additionally deliver monies, to and from the drug point owners, runners, and sellers; they often served as messengers for members of the conspiracy; and would often serve as intermediaries during drug transactions.

COUNT TWO

Aiding and Abetting in the Possession/Distribution of Cocaine Base

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Canovanas, District of Puerto Rico and within the jurisdiction of this Court,

- [1] MIGUEL A. CANALES-VILLALONGO, a.k.a. “Buby”, “El Boss”,
- [2] JOSE A. RIVERA-AYALA, a.k.a. “Joito”,
- [3] LUIS M. DE JESUS-LOPEZ, a.k.a. “Willo”,
- [4] RAYMOND E. HIRALDO-FIGUEROA,
- [5] JUAN C. ORTEGA-RIVERA, a.k.a. “Kili”,
- [6] JORGE QUIÑONEZ-OSORIO a.k.a. “Jorgito”,
- [7] JOSE D. ALAMA-VIZCARRONDO, a.k.a. “Pulmon”,
- [8] FELIPE RAMOS-SANTOS, a.k.a. “Curu”,
- [9] ELVIN O. ORTIZ-CORREA, a.k.a. “Bemba”,
- [10] WILLIAM CRESPO-RIVERA, a.k.a. “Willito”,
- [11] RAMON E. FIGUEROA-GARCE, “Bebo Marcia”,
- [12] ALEJANDRO FELICIANO-ANDINO, a.k.a. “Muslo”,
- [13] LUIS E. FUENTES-WALKER,

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[14] VICTOR J. CALDERON-ZAYAS, a.k.a. "Jordan",
[15] EDWIN BARBOSA-VIZCARRONDO,
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[30] NATHANAEL RAMOS-SANTOS,
[31] DIANA COLON,

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (Crack), a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real property comprising a public or private school and/or playground. All in violation of Title 21, United States Code, §§ 841(a)(1), 860; and Title 18, United States Code, § 2.

COUNT THREE

Aiding and Abetting in the Possession/Distribution of Cocaine

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Canovanas, District of Puerto Rico and within the jurisdiction of this Court,

[1] MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss",
[2] JOSE A. RIVERA-AYALA, a.k.a. "Joito",
[3] LUIS M. DE JESUS-LOPEZ, a.k.a. "Willo",
[4] RAYMOND E. HIRALDO-FIGUEROA,

- [5] JUAN C. ORTEGA-RIVERA, a.k.a. "Kili",
- [6] JORGE QUIÑONEZ-OSORIO a.k.a. "Jorgito",
- [7] JOSE D. ALAMA-VIZCARRONDO, a.k.a. "Pulmon",
- [8] FELIPE RAMOS-SANTOS, a.k.a. "Curu",
- [9] ELVIN O. ORTIZ-CORREA, a.k.a. "Bemba",
- [10] WILLIAM CRESPO-RIVERA, a.k.a. "Willito",
- [11] RAMON E. FIGUEROA-GARCE, "Bebo Marcia",
- [12] ALEJANDRO FELICIANO-ANDINO, a.k.a. "Muslo",
- [13] LUIS E. FUENTES-WALKER,
- [14] VICTOR J. CALDERON-ZAYAS, a.k.a. "Jordan",
- [15] EDWIN BARBOSA-VIZCARRONDO,
- [16] EVELYN CANALES-VILLALONGO, a.k.a. "Bebi",
- [17] ANGEL CANALES-VILLALONGO, a.k.a. "Blade",
- [18] JOSE M. DELGADO-PEREZ, a.k.a. "El Gallero",
- [19] FRANCISCO O. FELICIANO-ANDINO, a.k.a. "Frank",
- [20] JOSE E. FIGUEROA-GARCE, a.k.a. "Lobo",
- [21] KELVIN M. LOPEZ-VEGA, a.k.a. "Jonkiel",
- [22] JACKELINE RENTAS-DE-JESUS,
- [23] ALEXIS PARRILLA-ECHEVARRIA, "Carton",
- [24] JOSE R. RODRIGUEZ-RIVERA, "Vaca",
- [25] YANIBAL ORTIZ-ARROYO,
- [26] LUIS M. ANDINO-BERNIER, a.k.a. "Maño",
- [27] ROY J. RODRIGUEZ-ROMAN, a.k.a. "Cara De Vieja",
- [28] LIZA ANDINO,
- [29] RAUL ALVAREZ-HERNANDEZ, a.k.a. "Paul", "Ñe",
- [30] NATHANAEL RAMOS-SANTOS,
- [31] DIANA COLON,

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of the real property comprising a public or private school and/or playground. All in violation of Title 21, United States Code, §§ 841(a)(1), 860; and Title 18, United States Code, § 2.

COUNT FOUR

Aiding and Abetting in the Possession/Distribution of Marijuana

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Canovanas, District of Puerto Rico

and within the jurisdiction of this Court,

- [1] MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss",
- [2] JOSE A. RIVERA-AYALA, a.k.a. "Joito",
- [3] LUIS M. DE JESUS-LOPEZ, a.k.a. "Willo",
- [4] RAYMOND E. HIRALDO-FIGUEROA,
- [5] JUAN C. ORTEGA-RIVERA, a.k.a. "Kili",
- [6] JORGE QUIÑONEZ-OSORIO a.k.a. "Jorgito",
- [7] JOSE D. ALAMA-VIZCARRONDO, a.k.a. "Pulmon",
- [8] FELIPE RAMOS-SANTOS, a.k.a. "Curu",
- [9] ELVIN O. ORTIZ-CORREA, a.k.a. "Bemba",
- [10] WILLIAM CRESPO-RIVERA, a.k.a. "Willito",
- [11] RAMON E. FIGUEROA-GARCE, "Bebo Marcia",
- [12] ALEJANDRO FELICIANO-ANDINO, a.k.a. "Muslo",
- [13] LUIS E. FUENTES-WALKER,
- [14] VICTOR J. CALDERON-ZAYAS, a.k.a. "Jordan",
- [15] EDWIN BARBOSA-VIZCARRONDO,
- [16] EVELYN CANALES-VILLALONGO, a.k.a. "Bebi",
- [17] ANGEL CANALES-VILLALONGO, a.k.a. "Blade",
- [18] JOSE M. DELGADO-PEREZ, a.k.a. "El Gallero",
- [19] FRANCISCO O. FELICIANO-ANDINO, a.k.a. "Frank",
- [20] JOSE E. FIGUEROA-GARCE, a.k.a. "Lobo",
- [21] KELVIN M. LOPEZ-VEGA, a.k.a. "Jonkiel",
- [22] JACKELINE RENTAS-DE-JESUS,
- [23] ALEXIS PARRILLA-ECHEVARRIA, "Carton",
- [24] JOSE R. RODRIGUEZ-RIVERA, "Vaca",
- [25] YANIBAL ORTIZ-ARROYO,
- [26] LUIS M. ANDINO-BERNIER, a.k.a. "Maño",
- [27] ROY J. RODRIGUEZ-ROMAN, a.k.a. "Cara De Vieja",
- [28] LIZA ANDINO,
- [29] RAUL ALVAREZ-HERNANDEZ, a.k.a. "Paul", "Ñe",
- [30] NATHANAEL RAMOS-SANTOS,
- [31] DIANA COLON,

the defendants herein, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of the real property comprising a public or private school and/or playground. All in violation of Title 21, United States Code, §§ 841(a)(1), 860; and Title 18, United States Code, § 2.

COUNT FIVE

Using and Carrying Firearms During and in Relation to a Drug Trafficking Crime

Beginning on a date unknown, but no later than in or about the year 2007, and continuing up to and until the return of the instant Indictment, in the Municipality of Canovanas, District of Puerto Rico and within the jurisdiction of this Court,

- [1] MIGUEL A. CANALES-VILLALONGO, a.k.a. "Buby", "El Boss",
- [2] JOSE A. RIVERA-AYALA, a.k.a. "Joito",
- [3] LUIS M. DE JESUS-LOPEZ, a.k.a. "Willo",
- [4] RAYMOND E. HIRALDO-FIGUEROA,
- [5] JUAN C. ORTEGA-RIVERA, a.k.a. "Kili",
- [6] JORGE QUIÑONEZ-OSORIO a.k.a. "Jorgito",
- [7] JOSE D. ALAMA-VIZCARRONDO, a.k.a. "Pulmon",
- [8] FELIPE RAMOS-SANTOS, a.k.a. "Curu",
- [9] ELVIN O. ORTIZ-CORREA, a.k.a. "Bemba",
- [10] WILLIAM CRESPO-RIVERA, a.k.a. "Willito",
- [11] RAMON E. FIGUEROA-GARCE, "Bebo Marcia",
- [12] ALEJANDRO FELICIANO-ANDINO, a.k.a. "Muslo",

the defendants herein, aiding and abetting each other, did knowingly and unlawfully use and carry firearms as that term is defined in Title 18, United States Code, Section 921(a)(3), during and in relation to a drug trafficking crime as charged in counts one (1) through four (4) of the instant Indictment. All in violation of Title 18, United States Code, §§ 924(c)(1)(A) and 2.

NARCOTICS FORFEITURE ALLEGATION

1. Upon conviction of one or more of the offenses alleged in Counts One (1) through Four (4) of this Indictment, pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of one or more of the offenses set forth in said counts, shall forfeit to the United States:

a. All right, title, and interest in any and all property involved in each offense in violation of Title 21, United States Code, Sections 841, 846, 860 and 853 for which the defendants are convicted, and all property traceable to such property, including the following: 1) all commissions, fees and other property constituting proceeds, directly or indirectly, obtained as a result of those violations; and 2) all property used in any manner or part to commit or to facilitate the commission of those violations. The property to be forfeited includes, but is not limited to, the following:

i. A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted, to wit: one million dollars (\$1,000,000.00) in U.S. Currency. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

2. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in paragraph one (1), if, by any act or omission of the defendant, the property described in paragraph one (1), or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

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All in accordance with Title 18, United States Code, Sections 853 and 982(a)(1) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

TRUE BILL

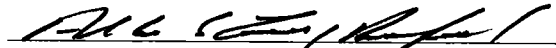
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Date: 7 MARCH 2013

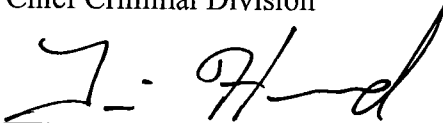
ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney



José Ruiz-Santiago
Assistant United States Attorney
Chief Criminal Division



Alberto R. López-Rocafort
Assistant United States Attorney



Timothy Henwood
Assistant United States Attorney
Deputy Chief, Narcotics Unit International



José Capó-Friarte
Assistant United States Attorney
Deputy Chief, Narcotics Unit Domestic